

**Interrogatory No. 22:**

State the name, address and phone number of each and every fact witness you intend to call at the trial of this matter and briefly state the substance of their testimony.

**Answer:**

1. Andrea Willetz – Girlfriend
2. Zyta Serafin – Mother
3. Kazimierz Serafin - Father

**Interrogatory No. 23:**

Identify any expert witnesses you propose calling in this matter, the technical field in which you claim they are an expert, the substance of the facts and opinions to which the expert is expected to testify and whether any written reports have been prepared by the expert.

**Answer:**

On advice of counsel and without limitation or waiver of any of the foregoing objections, the plaintiff identifies Dr. Deepan Patel, Dr. Joshua Rovner and all examining and treating physicians, doctors, therapists and radiologists as experts who may be called to testify at the time of trial.

Additionally, this plaintiff identifies all persons named in parties' discovery of this matter, as well as in any medical records attached thereto. This plaintiff further identifies all agents, servants, and employees of all parties to this matter and others who will be supplied in the discretion of trial counsel and as a result of the ongoing investigation and discovery. Further, this plaintiff reserves the right to identify and name additional medical and/or liability experts, the reports and names of which will be supplied if and when retained.

**Interrogatory No. 24:**

Identify each and every document you intend to introduce at the trial of the within matter.

**Answer:**

To be supplied throughout the course of ongoing discovery.

